

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**  
*Philadelphia Division*

|   |                                     |
|---|-------------------------------------|
| IN RE:<br>SAMANTHA K NARANJO            | Case No. 23-12249-amc<br>Chapter 13 |
| Freedom Mortgage Corporation,<br>Movant |                                     |
| vs.                                     |                                     |
| SAMANTHA K NARANJO ,<br>Debtor          |                                     |

**WITHDRAWAL OF MOTION TO APPROVE LOAN MODIFICATION**

Freedom Mortgage Corporation (“Movant”), by and through its legal counsel, hereby withdraws its MOTION TO APPROVE LOAN MODIFICATION filed on December 22, 2023, Docket Number 33.

This 22nd day of December, 2023.

/s/Mario Hanyon  
Andrew Spivack, PA Bar No. 84439  
Matthew Fissel, PA Bar No. 314567  
Mario Hanyon, PA Bar No. 203993  
Ryan Starks, PA Bar No. 330002  
Jay Jones, PA Bar No. 86657  
Attorney for Creditor  
BROCK & SCOTT, PLLC  
3825 Forrestgate Drive  
Winston Salem, NC 27103  
Telephone: (844) 856-6646  
Facsimile: (704) 369-0760  
E-Mail: PABKR@brockandscott.com

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| Freedom Mortgage Corporation,<br>Movant |                                     |
| vs.                                     |                                     |
| SAMANTHA K NARANJO ,<br>Debtor          |                                     |

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing Withdrawal of Motion to Approve Loan Modification has been electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

BRAD J. SADEK, Debtor's Attorney  
1500 JFK Boulevard  
Ste 220  
Philadelphia, PA 19102  
brad@sadeklaw.com

SCOTT F WATERMAN [Chapter 13], Bankruptcy Trustee  
2901 St. Lawrence Ave.  
Suite 100  
Reading, PA 19606

Office of the U.S. Trustee, US Trustee  
Robert N.C. Nix Federal Building  
900 Market Street, Suite 320  
Philadelphia, PA 19107

Via First Class Mail:

23-17968 BKOBJ02

SAMANTHA K NARANJO  
3225 BELGREEN ROAD  
PHILADELPHIA, PA 19154

Date: December 26, 2023

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Matthew Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

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